

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY and STATE  
FARM FIRE AND CASUALTY  
COMPANY,

Plaintiffs,

v.

PETER J. HANSON, P.C. D/B/A HANSON  
CHIROPRACTIC and PETER J. HANSON,

Defendants.

No. 2:16-cv-01085-RSL

**STIPULATED ORDER REGARDING  
PLAINTIFFS' MOTION TO COMPEL**

**NOTE ON MOTION CALENDAR:  
SEPTEMBER 5, 2017**

Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company ("State Farm Plaintiffs") and Defendants Peter J. Hanson, P.C. d/b/a Hanson Chiropractic and Peter J. Hanson ("Hanson Defendants") stipulate and agree that in exchange for withdrawal of the State Farm Plaintiffs' Motion to Compel (Dkt. No 57), the Hanson Defendants will undertake the following measures:

1. Hanson Defendants shall retain third-party vendor eDiscovery Inc. to collect and produce, in a forensically sound manner, Hanson Chiropractic's complete patient files for the at-

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1 issue patients listed in SF00173980ROD – SF00173984PROD (adult patients) and  
 2 SF00173990PROD – SF00173991PROD (minor patients) at Defendants' expense. Complete  
 3 patient files includes but is not limited to any intake forms, correspondence, medical records,  
 4 billing documents or other documentation concerning any treatment, services, or products  
 5 provided by Defendants to the at-issue patients from January 1, 2009 to the present. This includes  
 6 treatment, services, and/or products relating to auto accident injuries as well as non-auto accident-  
 7 related care. The complete patient files must be produced to the State Farm Plaintiffs within 30  
 8 days of this Order.

9 2. Hanson Defendants shall retain third-party vendor eDiscovery Inc. to collect and  
 10 produce, in a forensically sound manner, certain emails at Defendants' expense. Responsive  
 11 emails must be produced to the State Farm Plaintiffs within 30 days of this Order. The email  
 12 collection will include the following email accounts: chiropete@comcast.net;  
 13 drhanson@hansonchiro.com; newpatientassistant@gmail.com;  
 14 frontdesk.hansonchiro@gmail.com; tn0446@gmail.com; ryanwoodburydc@aol.com;  
 15 sglinesdc@gmail.com; jwaldropdc@hotmail.com; tatyana.chiro@gmail.com;  
 16 kayla.chiro@gmail.com; tina.hansonchiro@gmail.com; ipcoach.hansonchiro@gmail.com;  
 17 edward.chiro@gmail.com; stevie.chiro@gmail.com; and any other email accounts used by current  
 18 Hanson Chiropractic employees or contractors to communicate regarding Hanson Chiropractic  
 19 patients during the time period January 1, 2009 to the present. Email documents (including any  
 20 attachments) that pertain or relate to any of the following shall be produced:

- 21 a. The at-issue patients listed in SF00173980ROD – SF00173984PROD (adult  
 22 patients) and SF00173990PROD – SF00173991PROD (minor patients), including  
 23 but not limited to communications with patients, referral sources, attorneys, or other  
 24

1 health care providers, as well as communications relating to patient intake,  
2 treatment, billing and payment;

3 b. free or discounted services and write-offs (including any related marketing or  
4 advertising); and

5 3. The parties agree to use Allison Goodman of eDiscovery Inc. as the forensic  
6 examiner and both plaintiffs and defendants must work cooperatively with the third party forensic  
7 vendor on an agreed process for identifying, collecting, and producing documents within the  
8 timeframes specified in this Order.

9 4. Hanson Defendants shall produce all documents reflecting free or discounted  
10 services offered or provided to non-automobile insurance patients and write-offs, discounts, and/or  
11 fee reductions applied to non-automobile insurance patients within 14 days of this Order. If  
12 Defendants previously produced responsive documents, they must identify by Bates number the  
13 documents responsive to each request. The documents described in this paragraph do not include  
14 patient-specific documents (i.e., an itemized billing statement for a particular patient) for patients  
15 who are not at-issue in this lawsuit.

16 5. The State Farm Plaintiffs may conduct up to four depositions (including re-opening  
17 the deposition of any persons already deposed) concerning information reflected in the documents  
18 ordered to be produced. These depositions shall be conducted within 30 days after Defendants  
19 complete their supplemental production of emails and patient files in accordance with this Order.

20 The State Farm Plaintiffs agree that the Motion to Compel (Dkt. No 57) is withdrawn if  
21 the Court enters this Stipulated Order.

22 DATED this 6<sup>th</sup> day of Sept., 2017.

23 MRS Lasnik  
24 The Honorable Robert S. Lasnik  
United States District Judge

Presented by:

CORR CRONIN MICHELSON  
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s/ Steven W. Fogg

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